



42-045-00076
Monroe Energy, LLC
Trainer Refinery
4101 Post Road
Trainer, PA 19061
(610) 364-8000

January 27, 2014

FedEx 7977 7091 7258

Mr. James Rebarchak
Regional Manager - Air Quality
Commonwealth of Pennsylvania
Pennsylvania Depart of Environmental Protection
2 East Main St.
Norristown, PA 19401

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RE: MONROE ENERGY TRAINER REFINERY SEMI ANNUAL LDAR REPORTS

Dear Mr. Rebarchak:

As required by 40 CFR 60.592(e), Monroe Energy Trainer Refinery hereby submits the Semi-Annual LDAR Reports for the time period July 1, 2013 through December 31, 2013.

1. NSPS LDAR Report. NSPS LDAR Report consists of the following documents:

- Compliance Monitoring Summary NSPS Subpart VV
- Compliance Repair Delay List NSPS Subpart VV
- NSPS Subpart VV Repair Delayed History – Components Repaired During Reporting Period.
- NSPS Subpart VV Summary of Components Added and Deleted During Reporting Period.

Units subject to the MACT program are found in the following refinery process units or processing areas:

- FCCU wet gas compressor
- HF Alkylation
- Propane Recovery
- Propane Storage
- Propane Rail Car Loading
- Diesel
- Kerosene

2. MACT LDAR Report, per 40 CFR 63.10 (a) (6). The MACT LDAR report consists of the following documents:

- Compliance Monitoring Summary - MACT Report
- Compliance Repair Delay List – MACT
- MACT Repair Delayed History – Components Repaired During Reporting Period.
- MACT Summary of Components Added and Deleted During Reporting Period.

Units subject to the MACT program are found in the following refinery process units or processing areas:

- Alky
- Amine
- Crude
- FCC
- Gasoline Blending
- Isocracker
- Marine Terminal VRS

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- ivapmna
- Platformer
- Reformat
- Sulfur Recovery Unit
- Tank Farm
- VGO
- Sun Olin

3. MACT GGGa LDAR Report, per 40 CFR 60.592(e). The MACT GGGa LDAR Report consists of the following documents:

- Compliance Monitoring Summary MACT GGGa
- Compliance Repair Delay List – MACT GGGa
- MACT GGGa Repair Delayed History – Components Repaired During Reporting Period.
- MACT GGGa Summary of Components Added and Deleted During Reporting Period.

Units subject to the MACT GGGa program are found in the following refinery process units or processing areas:

- Boilers 9 and 10

As required by the Consent Decree H-05-0258, paragraph 236, Monroe Energy is hereby notifying you that the report leak rates contained herein for valves and pumps are those applicable regulatory leak definitions in Title 40 CFR, 60.482. In addition to the aforementioned Consent Decree, all valves with a leak rate of over 10,000 ppm that required a Drill and Tap were successfully repaired to a leak rate less than 500 ppm and were not placed on Delay of Repair list.

Subject to the penalties of Title 18 Pa. C.S. Section 4904 and 35 P.S. Section 4009 (b) (2), I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this form are true, accurate, and complete.

Should you have any questions or comments regarding this report, please contact Stephani Szymanski, LDAR Lead, at (610) 364-8073 or Matt Torell, Environmental Leader, at (610) 364-8399

Sincerely,



Jeffrey K. Warmann
CEO and President

Enclosures

cc: Mr. Andrew Clibanoff
USEPA Region III
Air Protection Division
3AP00
1650 Arch Street
Philadelphia, Pa 19103-1129
FedEx 7977 7089 8042

NSPS EPAVW LDAR SEMI ANNUAL REPORT
 COMPLIANCE MONITORING REPORT SUMMARY
 REPORT PERIOD: JULY 01 - DECEMBER 31, 2013
 REPORT DATE: JANUARY 24, 2014

UNIT	CLASS	MONTH	MONITORED	LEAKED	LATE LEAK
ALKY					
	PUMP	7	21	0	0
	PUMP	8	21	0	0
	PUMP	9	21	2	0
	PUMP	10	21	0	0
	PUMP	11	22	2	0
	PUMP	12	21	0	0
	RELIEF	9	25	1	1
	RELIEF	11	4	0	0
	RELIEF	12	20	0	0
	VALVE	7	9	0	0
	VALVE	8	2,469	2	0
	VALVE	9	21	1	0
	VALVE	10	137	0	0
	VALVE	11	2,470	1	0
	VALVE	12	19	1	1
			5,301	10	2
AMINE					
	PUMP	7	8	0	0
	PUMP	8	8	0	0
	PUMP	9	8	0	0
	PUMP	10	8	0	0
	PUMP	11	8	1	0
	PUMP	12	8	0	0
	RELIEF	9	8	0	0
	RELIEF	12	7	0	0
	VALVE	7	668	0	0
	VALVE	10	668	0	0
			1,399	1	0
BLEND					
	PUMP	7	15	0	0
	PUMP	8	15	0	0
	PUMP	9	15	0	0
	PUMP	10	15	0	0
	PUMP	11	15	0	0
	PUMP	12	15	0	0
	RELIEF	9	16	1	0
	RELIEF	10	2	1	0
	RELIEF	12	15	0	0
	VALVE	7	1,122	1	0
	VALVE	8	10	0	0
	VALVE	9	6	0	0
	VALVE	10	1,124	0	0
	VALVE	11	7	0	0
			2,392	3	0
BOILER					
	RELIEF	9	1	0	0
	RELIEF	12	1	0	0
	VALVE	7	10	0	0
	VALVE	8	125	0	0
	VALVE	11	126	0	0
			263	0	0
BUTANE					
	RELIEF	9	7	0	0

	RELIEF	12	7	0	0
	VALVE	8	301	0	0
	VALVE	11	303	0	0
			618	0	0
CRUDE					
	PUMP	7	2,661	0	0
	PUMP	8	19	0	0
	PUMP	9	19	0	0
	PUMP	10	19	0	0
	PUMP	11	19	0	0
	PUMP	12	19	0	0
	RELIEF	9	25	0	0
	RELIEF	12	26	0	0
	VALVE	7	1	0	0
	VALVE	8	2,291	0	0
	VALVE	9	11	0	0
	VALVE	11	2,307	1	0
	VALVE	12	38	0	0
			8,691	1	0
DESALT					
	PUMP	7	9	0	0
	PUMP	8	9	0	0
	PUMP	9	9	0	0
	PUMP	10	9	0	0
	PUMP	11	9	0	0
	PUMP	12	9	0	0
	RELIEF	9	11	1	0
	RELIEF	12	9	0	0
	VALVE	7	573	0	0
	VALVE	8	45	0	0
	VALVE	9	4	1	0
	VALVE	10	775	0	0
	VALVE	11	273	0	0
	VALVE	12	3	0	0
			1,747	2	0
DIESEL					
	PUMP	7	9	0	0
	PUMP	8	9	0	0
	PUMP	9	9	0	0
	PUMP	10	11	0	0
	PUMP	11	9	0	0
	PUMP	12	9	0	0
	RELIEF	9	6	1	1
	RELIEF	11	2	0	0
	RELIEF	12	9	0	0
	VALVE	7	600	0	0
	VALVE	9	2	0	0
	VALVE	10	728	1	0
	VALVE	11	358	0	0
	VALVE	12	55	0	0
			1,816	2	1
FCC					
	PUMP	7	19	0	0
	PUMP	8	19	0	0
	PUMP	9	19	0	0
	PUMP	10	19	0	0
	PUMP	11	19	0	0
	PUMP	12	19	0	0
	RELIEF	9	22	0	0
	RELIEF	12	22	0	0
	VALVE	7	9	0	0

	VALVE	8	1,623	2	0
	VALVE	9	9	0	0
	VALVE	10	6	0	0
	VALVE	11	1,624	2	1
	VALVE	12	1	0	0
			3,430	4	1
FLARE					
	PUMP	7	3	0	0
	PUMP	8	3	0	0
	PUMP	9	3	0	0
	PUMP	10	3	0	0
	PUMP	11	3	0	0
	PUMP	12	3	0	0
	VALVE	9	173	0	0
	VALVE	10	1	0	0
	VALVE	11	8	0	0
	VALVE	12	169	0	0
			369	0	0
ISOCRK					
	COMPR	7	3	0	0
	COMPR	8	2	0	0
	COMPR	9	2	0	0
	COMPR	10	2	0	0
	COMPR	11	2	0	0
	COMPR	12	2	0	0
	PUMP	7	15	0	0
	PUMP	8	15	0	0
	PUMP	9	15	0	0
	PUMP	10	15	3	1
	PUMP	11	15	0	0
	PUMP	12	15	0	0
	RELIEF	7	21	0	0
	RELIEF	8	3	0	0
	RELIEF	9	31	0	0
	RELIEF	10	2	0	0
	RELIEF	11	2	0	0
	RELIEF	12	39	1	0
	VALVE	7	2,776	1	0
	VALVE	8	17	0	0
	VALVE	9	11	0	0
	VALVE	10	2,778	2	1
	VALVE	11	25	0	0
	VALVE	12	10	1	1
			5,818	8	3
KERO					
	COMPR	8	1	2	1
	COMPR	9	1	0	0
	COMPR	10	1	0	0
	COMPR	11	1	0	0
	COMPR	12	1	0	0
	PUMP	7	9	0	0
	PUMP	8	9	0	0
	PUMP	9	9	0	0
	PUMP	10	10	0	0
	PUMP	11	9	0	0
	PUMP	12	9	0	0
	RELIEF	9	16	0	0
	RELIEF	11	1	0	0
	RELIEF	12	20	0	0
	VALVE	7	1,072	0	0
	VALVE	8	204	0	0

	VALVE	9	2	0	0
	VALVE	10	1,384	5	2
	VALVE	11	487	0	0
	VALVE	12	23	0	0
			3,269	7	3
LOWLN					
	PUMP	7	3	1	0
	PUMP	8	3	0	0
	PUMP	9	4	0	0
	PUMP	10	5	0	0
	PUMP	11	4	0	0
	PUMP	12	4	0	0
	RELIEF	9	5	0	0
	RELIEF	12	6	0	0
	VALVE	7	448	0	0
	VALVE	8	12	0	0
	VALVE	9	1	0	0
	VALVE	10	536	0	0
	VALVE	11	138	0	0
			1,169	1	0
MARINE					
	CONECT	8	1	2	0
	RELIEF	9	6	0	0
	RELIEF	12	8	0	0
	VALVE	8	184	0	0
	VALVE	11	185	0	0
			384	2	0
NAPHTH					
	CONECT	10	1	2	0
	CONECT	11	2	1	0
	PUMP	7	12	0	0
	PUMP	8	12	0	0
	PUMP	9	12	4	0
	PUMP	10	12	3	0
	PUMP	11	12	3	0
	PUMP	12	12	0	0
	RELIEF	9	9	0	0
	RELIEF	12	9	0	0
	VALVE	7	4	0	0
	VALVE	8	2	0	0
	VALVE	9	1,242	0	0
	VALVE	10	5	0	0
	VALVE	12	1,247	0	0
			2,593	13	0
PLATFO					
	COMPR	7	1	0	0
	COMPR	8	1	0	0
	COMPR	9	1	0	0
	COMPR	10	1	0	0
	COMPR	11	1	0	0
	COMPR	12	1	0	0
	PUMP	7	8	0	0
	PUMP	8	8	0	0
	PUMP	9	8	0	0
	PUMP	10	8	0	0
	PUMP	11	8	0	0
	PUMP	12	8	0	0
	RELIEF	9	25	0	0
	RELIEF	12	25	0	0
	VALVE	7	16	0	0
	VALVE	8	12	0	0
	VALVE	9	2,010	2	0

	VALVE	10	13	0	0
	VALVE	11	2	0	0
	VALVE	12	2,006	0	0
			4,163	2	0
PRORCL					
	PUMP	7	1	0	0
	PUMP	8	1	0	0
	PUMP	9	1	0	0
	PUMP	10	1	0	0
	PUMP	11	1	0	0
	PUMP	12	1	0	0
	RELIEF	9	3	0	0
	RELIEF	12	3	0	0
	VALVE	7	1	0	0
	VALVE	8	1	0	0
	VALVE	9	310	1	0
	VALVE	10	4	0	0
	VALVE	11	1	0	0
	VALVE	12	310	2	0
			635	3	0
PROREC					
	PUMP	7	2	0	0
	PUMP	8	2	0	0
	PUMP	9	2	0	0
	PUMP	10	2	0	0
	PUMP	11	2	0	0
	PUMP	12	2	0	0
	RELIEF	9	7	0	0
	RELIEF	11	1	0	0
	RELIEF	12	7	0	0
	VALVE	7	1	0	0
	VALVE	8	973	0	0
	VALVE	9	3	0	0
	VALVE	10	1	0	0
	VALVE	11	1,016	0	0
	VALVE	12	45	0	0
			2,066	0	0
PROSTO					
	PUMP	7	8	0	0
	PUMP	8	8	0	0
	PUMP	9	8	0	0
	PUMP	10	8	0	0
	PUMP	11	8	0	0
	PUMP	12	8	0	0
	RELIEF	7	1	0	0
	RELIEF	8	1	0	0
	RELIEF	9	20	0	0
	RELIEF	10	1	0	0
	RELIEF	12	19	0	0
	VALVE	7	538	0	0
	VALVE	8	3	0	0
	VALVE	9	2	0	0
	VALVE	10	536	1	1
	VALVE	11	1	0	0
	VALVE	12	1	0	0
			1,171	1	1
REFORM					
	PUMP	7	8	0	0
	PUMP	8	8	0	0
	PUMP	9	8	0	0
	PUMP	10	8	0	0
	PUMP	11	8	0	0

	PUMP	12	8	0	0
	RELIEF	9	5	0	0
	RELIEF	11	1	0	0
	RELIEF	12	5	0	0
	VALVE	7	1	0	0
	VALVE	8	753	0	0
	VALVE	9	7	0	0
	VALVE	10	1	0	0
	VALVE	11	767	0	0
	VALVE	12	8	0	0
			1,596	0	0
SOUR					
	PUMP	7	1	0	0
	PUMP	8	1	0	0
	PUMP	9	1	0	0
	PUMP	10	1	0	0
	PUMP	11	1	0	0
	PUMP	12	1	0	0
	RELIEF	9	2	0	0
	RELIEF	12	2	0	0
	VALVE	8	98	0	0
	VALVE	9	8	0	0
	VALVE	10	10	0	0
	VALVE	11	106	0	0
			232	0	0
SOUTH TANK FARM					
	COMPR	9	1	0	0
	PUMP	7	29	1	0
	PUMP	8	29	0	0
	PUMP	9	29	0	0
	PUMP	10	29	2	0
	PUMP	11	29	0	0
	PUMP	12	28	2	0
	RELIEF	7	2	0	0
	RELIEF	8	2	0	0
	RELIEF	9	36	0	0
	RELIEF	10	2	0	0
	RELIEF	11	1	0	0
	RELIEF	12	100	0	0
	VALVE	7	23	0	0
	VALVE	8	5	0	0
	VALVE	9	2,582	2	0
	VALVE	10	33	0	0
	VALVE	11	2	0	0
	VALVE	12	2,611	1	0
			5,573	8	0
SRU					
	RELIEF	9	6	0	0
	RELIEF	12	6	0	0
	VALVE	7	494	0	0
	VALVE	10	494	0	0
			1,000	0	0
SUNOL					
	RELIEF	9	4	0	0
	RELIEF	12	4	0	0
	VALVE	7	2	0	0
	VALVE	8	58	0	0
	VALVE	9	188	0	0
	VALVE	10	60	0	0
	VALVE	12	190	0	0
			506	0	0
TF					

	PUMP	7	11	0	0
	PUMP	8	11	0	0
	PUMP	9	11	0	0
	PUMP	10	11	0	0
	PUMP	11	11	0	0
	PUMP	12	11	0	0
	RELIEF	12	3	0	0
	VALVE	7	2	0	0
	VALVE	9	677	0	0
	VALVE	10	16	0	0
	VALVE	11	5	0	0
	VALVE	12	688	0	0
			1,457	0	0
VACUUM					
	PUMP	10	2	0	0
	PUMP	11	2	0	0
	PUMP	12	2	0	0
	RELIEF	12	2	0	0
	VALVE	7	247	1	0
	VALVE	8	1	0	0
	VALVE	9	1	1	0
	VALVE	10	468	0	0
	VALVE	11	232	0	0
	VALVE	12	3	0	0
			960	2	0
VGO					
	PUMP	7	1	0	0
	RELIEF	9	11	0	0
	RELIEF	12	11	0	0
	VALVE	7	436	0	0
	VALVE	8	1	0	0
	VALVE	10	436	0	0
	VALVE	11	1	0	0
			897	0	0
WGS					
	PUMP	7	4	0	0
	PUMP	8	4	0	0
	PUMP	9	4	0	0
	PUMP	10	4	0	0
	PUMP	11	4	0	0
	PUMP	12	4	0	0
	RELIEF	9	4	0	0
	RELIEF	12	4	0	0
	VALVE	7	1	0	0
	VALVE	8	1	0	0
	VALVE	9	434	0	0
	VALVE	10	1	0	0
	VALVE	11	10	0	0
	VALVE	12	435	0	0
			914	0	0
TOTAL			60,429	70	12

NSPS EPAV LDAR SEMI ANNUAL REPORT
 COMPLIANCE MONITORING REPORT SUMMARY
 REPORT PERIOD: JULY 01 - DECEMBER 31, 2013
 REPORT DATE: JANUARY 24, 2014

UNIT	TAG	CLASS	INSPECTION DATE	PLACED ON DELAY	REMOVED FROM REPAIR
ALKY	176485	RELIEF	09/23/2013	09/27/2013	
ALKY	400456	VALVE	12/26/2013	12/26/2013	
DIESEL	01574	RELIEF	09/18/2013	09/23/2013	11/26/2013
ISOCRK	076764	PUMP	10/23/2013	11/07/2013	
ISOCRK	153916	VALVE	10/18/2013	10/30/2013	01/29/2014
ISOCRK	155156	VALVE	12/10/2013	12/23/2013	
KERO	00001	COMPR	08/16/2013	08/30/2013	
KERO	00766	VALVE	10/15/2013	10/30/2013	
KERO	00737	VALVE	10/17/2013	10/30/2013	
PROSTO	301152	VALVE	10/09/2013	10/23/2013	01/20/2014
TOTAL				10	

NSPS EPAV/LDAR SEMI ANNUAL REPORT
 COMPLIANCE REPAIR DELAY LIST
 REPORT PERIOD: JULY 01 - DECEMBER 31, 2013
 REPORT DATE: JANUARY 24, 2014

UNIT	TAG	CLASS	INSPECTION DATE	PLACED ON DELAY	OFF DELAY
DIESEL	01574	RELIEF	09/18/2013	09/23/2013	11/26/2013
ISOCRK	153916	VALVE	10/18/2013	10/30/2013	01/29/2014
PROSTO	301152	VALVE	10/09/2013	10/23/2013	01/20/2014
TOTAL				3	

NSPS EPAVV LDAR SEMI ANNUAL REPORT
 ADDED AND DELETED
 REPORT PERIOD: JULY 01 - DECEMBER 31, 2013
 REPORT DATE: JANUARY 24, 2014

UNIT	CLASS	ADDED	DELETED
ALKY	PRESSURE RELIEF DEVICE	0	0
ALKY	PUMP	0	1
ALKY	VALVE	0	8
AMINE	PRESSURE RELIEF DEVICE	0	6
AMINE	PUMP	0	7
AMINE	VALVE	3	397
BLEND	PRESSURE RELIEF DEVICE	0	0
BLEND	PUMP	0	0
BLEND	VALVE	9	3
BOILER	PRESSURE RELIEF DEVICE	0	0
BOILER	VALVE	0	1
BUTANE	PRESSURE RELIEF DEVICE	0	0
BUTANE	VALVE	2	0
CRUDE	PRESSURE RELIEF DEVICE	0	1
CRUDE	PUMP	0	0
CRUDE	VALVE	15	14
DESALT	PRESSURE RELIEF DEVICE	5	2
DESALT	PUMP	5	0
DESALT	VALVE	289	81
DIESEL	COMPRESSOR	0	0
DIESEL	PRESSURE RELIEF DEVICE	11	2
DIESEL	PUMP	12	9
DIESEL	VALVE	392	323
FCC	PRESSURE RELIEF DEVICE	0	0
FCC	PUMP	0	0
FCC	VALVE	13	23
FLARE	PUMP	0	0
FLARE	VALVE	0	0
ISOCRK	COMPRESSOR	0	0
ISOCRK	PRESSURE RELIEF DEVICE	0	0
ISOCRK	PUMP	0	0
ISOCRK	VALVE	10	6
KERO	COMPRESSOR	0	0
KERO	PRESSURE RELIEF DEVICE	4	0
KERO	PUMP	1	4
KERO	VALVE	356	291
LOWLN	COMPRESSOR	0	0
LOWLN	PRESSURE RELIEF DEVICE	1	0
LOWLN	PUMP	1	0
LOWLN	VALVE	97	37
MARINE	COMPRESSOR	0	0
MARINE	CONNECTOR	1	0
MARINE	PRESSURE RELIEF DEVICE	0	0
MARINE	VALVE	1	0
NAPHTH	COMPRESSOR	0	0
NAPHTH	CONNECTOR	2	0
NAPHTH	PRESSURE RELIEF DEVICE	0	0
NAPHTH	PUMP	0	0
NAPHTH	VALVE	7	4

OYF	VALVE	0	0
PLATFO	COMPRESSOR	0	0
PLATFO	PRESSURE RELIEF DEVICE	0	0
PLATFO	PUMP	0	0
PLATFO	VALVE	0	5
PRORCL	PRESSURE RELIEF DEVICE	0	0
PRORCL	PUMP	0	0
PRORCL	VALVE	0	0
PROREC	PRESSURE RELIEF DEVICE	0	0
PROREC	PUMP	0	0
PROREC	VALVE	43	2
PROSTO	PRESSURE RELIEF DEVICE	0	0
PROSTO	PUMP	0	0
PROSTO	VALVE	1	1
REFORM	PRESSURE RELIEF DEVICE	1	0
REFORM	PUMP	0	0
REFORM	VALVE	8	0
SOUR	PRESSURE RELIEF DEVICE	0	0
SOUR	PUMP	0	0
SOUR	VALVE	0	0
SOUTH TANK FARM	COMPRESSOR	0	0
SOUTH TANK FARM	PRESSURE RELIEF DEVICE	1	4
SOUTH TANK FARM	PUMP	0	0
SOUTH TANK FARM	VALVE	27	74
SRU	COMPRESSOR	0	1
SRU	PRESSURE RELIEF DEVICE	0	0
SRU	VALVE	0	69
SUNOL	PRESSURE RELIEF DEVICE	3	0
SUNOL	VALVE	59	21
TAIL GAS	PRESSURE RELIEF DEVICE	0	0
TAIL GAS	VALVE	0	0
TF	PRESSURE RELIEF DEVICE	0	0
TF	PUMP	0	0
TF	VALVE	11	4
VACUUM	PRESSURE RELIEF DEVICE	3	0
VACUUM	PUMP	2	0
VACUUM	VALVE	237	23
VGO	COMPRESSOR	0	0
VGO	PRESSURE RELIEF DEVICE	0	0
VGO	PUMP	0	0
VGO	VALVE	0	1
WGS	COMPRESSOR	0	0
WGS	PRESSURE RELIEF DEVICE	0	0
WGS	PUMP	0	0
WGS	VALVE	3	9

TOTAL 1,636 1,434

VVRMACT SEMI ANNUAL LDAR REPORT
 COMPLIANCE MONITORING SUMMARY
 REPORT PERIOD: JULY 01 - DECEMBER 31, 2013
 REPORT DATE: JANUARY 24, 2013

UNIT	CLASS	MONTH	MONITORED	LEAKED	LATE REPAIR
BLEND					
	PUMP	7	7	0	0
	PUMP	8	7	0	0
	PUMP	9	7	0	0
	PUMP	10	7	0	0
	PUMP	11	7	0	0
	PUMP	12	7	0	0
			42	0	0
ISOCRK					
	PUMP	7	6	0	0
	PUMP	8	6	0	0
	PUMP	9	6	0	0
	PUMP	10	6	2	1
	PUMP	11	6	0	0
	PUMP	12	6	0	0
			36	2	1
NAPHTH					
	PUMP	7	11	0	0
	PUMP	8	11	0	0
	PUMP	9	11	4	0
	PUMP	10	11	3	0
	PUMP	11	11	1	0
	PUMP	12	11	0	0
			66	8	0
TOTAL:				144	10

VVRMACT SEMI ANNUAL LDAR REPORT
COMPLIANCE REPAIR DELAY LIST
REPORT PERIOD: JULY 01 - DECEMBER 31, 2013
REPORT DATE: JANUARY 24, 2013

UNIT	CLASS	INSPECTION DATE	PLACED ON DELAY
ISOCRK	PUMP	10/23/2013	11/7/2013

TOTAL 1

VVRMACT SEMI ANNUAL LDAR REPORT
COMPLIANCE REPAIR DELAY LIST
REPORT PERIOD: JULY 01 - DECEMBER 31, 2013
REPORT DATE: JANUARY 24, 2013

UNIT	CLASS	DATE ON DELAY	REMOVED
BLEND	PUMP	2/18/2013	7/15/2013
TOTAL			1

VVRMACT SEMI ANNUAL LDAR REPORT
 COMPONENTS ADDED AND DELETED
 REPORT PERIOD: JULY 01 - DECEMBER 31, 2013
 REPORT DATE: JANUARY 24, 2013

COMPLIANCE GROUP	CLASS	ADDED	DELETED
ALKY	VALVE	0	0
AMINE	VALVE	0	0
BLEND	PRESSURE RELIEF DEVICE	0	0
BLEND	PUMP	0	0
BLEND	VALVE	0	0
CRUDE	VALVE	0	0
DESALT	VALVE	0	0
FCC	VALVE	0	0
ISOCRK	PUMP	0	0
ISOCRK	VALVE	0	0
MARINE	VALVE	0	0
NAPHTH	COMPRESSOR	0	0
NAPHTH	PUMP	0	0
NAPHTH	VALVE	0	0
PLATFO	PRESSURE RELIEF DEVICE	0	0
PLATFO	VALVE	0	0
REFORM	PUMP	0	0
REFORM	VALVE	0	0
SOUTH TANK FARM	VALVE	0	0
SRU	VALVE	0	0
SUNOL	VALVE	0	0
TF	PRESSURE RELIEF DEVICE	0	0
TF	PUMP	0	0
TF	VALVE	0	0
VGO	PUMP	0	0
VGO	VALVE	0	0
TOTAL		0	0

MACT GGGa SEMI ANNUAL LDAR REPORT
 COMPLIANCE MONITORING REPORT SUMMARY
 REPORT PERIOD: JULY 01 - DECEMBER 31, 2013
 REPORT DATE: JANUARY 24, 2014

UNIT	CLASS	MONTH	MONITORED	LEAKED	LATE REPAIR
BOILERS 9 & 10					
	RELIEF	8	3	0	0
	RELIEF	11	3	0	0
	VALVE	7	1	0	0
	VALVE	8	384	0	0
	VALVE	11	384	1	0
	VALVE	12	1	0	0
TOTAL:			778	1	0

MACT GGGa SEMI ANNUAL LDAR REPORT
COMPLIANCE DELAY LIST
REPORT PERIOD: JULY 01 - DECEMBER 31, 2013
REPORT DATE: JANUARY 24, 2014

UNIT	ON DELAY
BOILERS 9 & 10	
	0
TOTAL	0

MACT GGGa SEMI ANNUAL LDAR REPORT
 REPAIR DELAYED HISTORY
 REPORT PERIOD: JULY 01 - DECEMBER 31, 2013
 REPORT DATE: JANUARY 24, 2014

UNIT	ON DELAY	OFF DELAY
BOILERS 9 & 10		
	0	0
TOTAL	0	0

MACT GGGa SEMI ANNUAL LDAR REPORT
 COMPONENTS ADDED AND DELETED
 REPORT PERIOD: JULY 01 - DECEMBER 31, 2013
 REPORT DATE: JANUARY 24, 2014

UNIT	CLASS	ADDED	DELETED
BOILERS 9 & 10			
	VALVE	0	3
TOTAL		0	3